

**BELDOCK LEVINE & HOFFMAN LLP**  
**99 PARK AVENUE, PH/26<sup>TH</sup> FLOOR**  
**NEW YORK, N.Y. 10016**

JONATHAN MOORE  
DAVID B. RANKIN  
LUNA DROUBI  
MARC A. CANNAN  
CYNTHIA ROLLINGS  
JONATHAN K. POLLACK  
HENRY A. DLUGACZ  
STEPHEN J. BLUMERT  
MYRON BELDOCK (1929-2016)  
LAWRENCE S. LEVINE (1934-2004)  
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400  
FAX: (212) 277-5880  
WEBSITE: blhny.com

COUNSEL  
BRUCE E. TRAUNER  
PETER S. MATORIN  
KAREN L. DIPPOLD  
MARJORY D. FIELDS  
EMILY JANE GOODMAN  
JUSTICE, NYS SUPREME COURT, RET.  
FRANK HANDELMAN

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WRITER'S DIRECT CONTACT:  
212-277-5816  
marena@blhny.com

**VIA ECF**

Honorable Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Huwe Burton v. City of New York, et al.*, 20-cv-09025 (AT) (RWL)**


Your Honor:

As counsel for Plaintiff in the above referenced case, we write to respectfully request an extension of time to file Plaintiff's motion for default judgment against Defendant Stacey Blocker a/ka/ Stacey Green ("Defendant Blocker") currently due on November 1, 2021. By way of background, a settlement has been reached in this matter with the City of New York, (Dkt. No. 76), and the City Defendants have been dismissed from the case, (Dkt. No. 75). The Court granted Plaintiff's request to reopen the case as to Defendant Blocker on September 17, 2021. (Dkt. No. 72). A Certificate of Default was issued against Defendant Blocker on October 27, 2021. (Dkt. No. 80).

The reason for this request is that Plaintiff needs additional time to prepare his proposed damages and the bases for those damages. Accordingly, Plaintiff respectfully requests that the deadline to file his motion for default judgment be extended 30 days from November 1, 2021, to December 1, 2021. This is Plaintiff's first request for an extension of time to file the default motion since the reopening of the case.

We thank the Court for its attention to this matter.

Respectfully submitted,

  
Marc Arena

cc: Stacey Blocker (by U.S. Mail)